

**Annual Report  
Phase II MS4 General Permit  
LAR040000 (AI 94338)**

**Permittee: Louisiana Department of Transportation and  
Development  
Date: 05/10/2005**

**Introduction:**

The Louisiana Department of Transportation and Development (LaDOTD) (Permittee) has begun implementation of the Storm Water Management Program (SWMP) as required by the LaDEQ Phase II MS4 permit number LAR040000 (AI 94338). We have completed the second year of a 5 year implementation schedule. Last year's activities included planning, budgeting and evaluation activities for most Best Management Practices (BMPs) included in the SWMP. The activities during this permit year include implementation, data tracking, and other pertinent tasks.

The LaDEQ small MS4 permit requires that the following information be submitted in each annual report by March 10<sup>th</sup> of each year during the permit term.

*...You must submit annual reports to LDEQ by March 10 for the preceding calendar year. Your report must include:*

- 1. The status of compliance with permit conditions, an assessment of the appropriateness of your identified best management practices and progress towards achieving your identified measurable goals for each of the minimum control measures;*
- 2. Results of information collected and analyzed, including monitoring data, if any, during the reporting period;*
- 3. A summary of the storm water activities you plan to undertake during the next reporting cycle; and*
- 4. A change in any identified measurable goals that apply to the program elements...*

The LaDOTD has prepared this annual report in compliance with this requirement. The annual report is divided into 4 sections corresponding to the 4 requirements listed above.

## **SECTION 1 Status of Compliance**

This section of the Report covers the following subjects:

- The status of the compliance with permit conditions
- An assessment of the appropriateness of the identified BMPs
- Progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP
- The measurable goals for each of the Minimum Control Measures (MCMs), and an evaluation of the success of the implementation of the measurable goals

According to 40CFR122.34, the combined focus of implementing the Storm Water Management Program composed of the 6 minimum measures is to achieve the primary objective of the Phase II MS4 program which is; "...develop, implement, and enforce a storm water management program designed to reduce the discharge of pollutants from your MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act".

### ***The status of the compliance with permit conditions***

The permittee is in compliance with the Phase II MS4 General Permit conditions.

- The permittee has developed a comprehensive storm water management program (SWMP) according to the requirements of the permit including BMP's, measurable goals, and implementation schedules for each of the 6 minimum measures.
- For this annual report, the permittee has evaluated it's compliance with regard to the SWMP implementation schedule. Currently, the permittee is in compliance with the previously submitted implementation schedule.

### ***An assessment of the appropriateness of the identified BMPs***

The permittee has determined that the BMPs developed and implemented according to the SWMP are appropriate to reach the goals of the Phase II MS4 General Permit conditions.

- The permittee has developed a comprehensive storm water management program (SWMP) according to the requirements of the permit including BMP's, measurable goals, and implementation schedules for each of the 6 minimum measures.
- For this annual report, the permittee has assessed the appropriateness of each BMP and does not request changes to the SWMP as noted in Section 4.

### ***Progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP***

Implementation of best management practices consistent with the provisions of the storm water management program required by the permit constitutes compliance with the standard of reducing pollutants to the "maximum extent practicable" or MEP.

- The permittee has developed a comprehensive storm water management program (SWMP) according to the requirements of the permit including BMP's, measurable goals, and implementation schedules for each of the 6 minimum measures.
- For this annual report, the permittee has evaluated it's compliance with regard to the SWMP implementation schedule and has assessed the appropriateness of each BMP as described in the previous two paragraphs of this report. Currently, the permittee has made progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP.

***The measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals***

The permittee has implemented the measurable goals according to the identified schedule. In section 2 of this report the measurable goals for each BMP are listed with details about compliance activities associated with each measurable goal required in the first permit year activities.

## **SECTION 2 Summary of Results**

This section of the Report covers a summary of the results of information collected and analyzed, if any, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.

The data is presented for each BMP included in the SWMP.

### **Minimum Measure: 1.0 Public Education**

The LaDOTD has developed a list of subjects for inclusion in public education and outreach materials during the first permit year. A summary of this years' activities are presented for each BMP below.

#### **BMP Report: Storm Water Quality Web-Site**

**BMP:** Storm Water Quality Web-Site

**BMP Description:** Development and maintenance of a website designed to educate the public on storm water quality issues.

#### **Compliance with the implementation schedule:**

Task: 2. Design and publish the website to the internet for public access.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken: The LaDOTD has designed and published the website.

Task: 4. Post new information to the website in accordance with the identified schedule.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken: New information will be posted on an annual basis or as data becomes available.

Task: 5. Maintain record of website traffic using a sign-in log or hit counter.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken: Website traffic is currently being measured using a hit counter.

### **Compliance with Measurable Goals:**

Goal: Design and publish *the storm water quality website to the internet for public access.*

Permit Year: 2

Compliance Activity: The storm water quality website was designed and published..

### **Accumulated data:**

The LaDOTD will continue to track website traffic and update website on an annual basis

### **Topics Covered by the BMP:**

The storm water quality website covers the following topics.

1. Citizen reporting of storm water quality problems
2. Impacts to local water bodies
3. Steps the public can take to reduce storm water pollution
4. Public involvement programs

### **BMP Report: Flyers and Brochures**

#### **BMP: Flyers and Brochures**

**BMP Description:** Development of flyers and brochures for the purpose of educating the public on storm water quality issues.

### **Compliance with the implementation schedule:**

Task: 2. Design and print flyers and brochures for the selected subjects.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Flyers and brochures were designed and printed for the selected subjects.

Task: 3. Develop a list of appropriate locations for flyer and brochure postings.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Flyers and brochures will be distributed through tourist information centers.

Task: 4. Develop a flyer and brochure posting schedule that is consistent with the implementation schedule of other BMP's included in the SWMP>

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Posting schedule was developed. Flyers and brochures will be posted quarterly.

### **Compliance with the Measurable Goal:**

Goal: Design and print flyers for each of the selected subjects

Permit Year: 2

Compliance Activity: Flyers and brochures have been printed and will be distributed throughout the LADOTD tourist information centers.

### **Accumulated data:**

The LaDOTD will continue to track the production and distribution of flyers and brochures.

### **Topics Covered by the BMP:**

The flyers and brochures cover the following topic.

1. Citizen reporting of storm water quality problems
2. Impacts to local water bodies
3. Steps the public can take to reduce storm water pollution
4. Public involvement programs

## **BMP Report: Public Service Announcements**

### **BMP: Public Service Announcements**

**BMP Description:** Development and broadcasting of public service announcements (PSA's) that focus on the impacts of storm water runoff on local water bodies and steps the public can take to reduce storm water pollution.- Anti-litter Campaigns- General Storm Water Quality Issues

### **Compliance with the implementation schedule:**

Task: 3. Develop Public Service Announcements on the selected subjects.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken: Public Service Announcements were developed.

Task: 4. Contact local television and radio media for information on broadcasting of PSA's.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken: Local television and radio station were contacted. A price list was developed.

### **Compliance with the Measurable Goal:**

Goal: Develop public service announcements on the selected subjects.

Permit Year: 2

Compliance activities:

### **Accumulated data:**

The LaDOTD will develop and begin tracking PSA data .

### **Topics Covered by the BMP:**

1. Anti-litter Campaign messages
2. The importance of water quality

## **BMP Report: Impacts of Illegal Dumping and Littering**

### **BMP:** Impacts of Illegal Dumping and Littering

**BMP Description:** Development and distribution of public education materials that focus on the impacts of illegal dumping and littering on local water bodies as well as methods for the public to report illegal dumping and/or litter occurrences and locations of incidents.

### **Compliance with the implementation schedule:**

The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following task was implemented according to the implementation schedule.

Task: 1. Develop and incorporate illegal dumping and anti-litter public education materials into the list of subjects to be included in brochures and flyers and storm water quality web-site.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Illegal dumping and anti-litter public education materials have been incorporated into the brochures, flyers, and storm water quality web site.

**Compliance with the Measurable Goal:**

Goal: Develop illegal dumping and anti-litter public education materials for incorporation into the list of subjects to be included in brochures and flyers and the storm water quality web-site

Permit Year: 2

Compliance activities: Subjects were included in brochures, flyers, and storm water quality web-site

**Accumulated data:**

The LADOTD will continue to track Illegal Dumping and Littering data included in flyers, brochures, and web-site

**BMP Report: Public Education on Construction Activities and New Development Activities**

**BMP: Public Education on Construction Activities and New Development Activities**

**BMP Description: Development and distribution of public education materials that focus on the impacts of construction site runoff and steps the public can take to report the occurrence of potential construction related storm water quality problems.**

**Compliance with the implementation schedule:**

The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following task was implemented according to the implementation schedule.

Task: 2. Distribute public education materials that focus on the mechanism for the public to report potential construction site runoff problems

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken: The web-site will be used as a primary mechanism for reporting potential construction site runoff problems.

Task: 4. Maintain records of the number and type of public education materials distributed.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: A record of the number and type of public education materials being distributed is being maintained

**Compliance with the Measurable Goal:**

Goal: Distribute public education materials that focus on the mechanism for the public to report potential construction site runoff problems.

Permit Year: 2

Activity Conducted: Web-site was designed with a feed-back mechanism specifically designed for reporting of storm water runoff.

## **Minimum Measure: 2.0 Public Involvement**

### **BMP Report: Adopt-A-Highway Program**

**BMP:** Adopt-A-Highway Program

**BMP Description:** Volunteer cleanup of highway segments.

**BMP Reporting Requirement:** Annually report on the number of highway segments under adoption, number of cleanup or maintenance events conducted, and the volume of litter removed at each event.

### **Compliance with the implementation schedule:**

Task: 3. Develop guidelines and schedules for Adopt-A-Highway cleanup events

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Guidelines and schedules for Adopt-A-Highway cleanup events have been established.

Task: 4. Invite identified groups to participate in the Adopt-A-Highway cleanup events.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Identified groups have been invited to participate.

### **Compliance with the Measurable Goal:**

Goal: Invite identified groups to participate in the Adopt-A-Highway program.

Year: 2

Compliance Activity:

**Accumulated data:**

### **BMP Report: SWMP Committee**

**BMP:** SWMP Committee

**BMP Description:** Formation of a committee to consider issues relative to SWMP program development and implementation

**BMP Reporting Requirement:** Annually report on the number of meetings and subjects presented.

**Compliance with the implementation schedule:**

Task: 4. Conduct SWMP Committee meetings in accordance with the developed schedule

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Meetings has been conducted in accordance with the schedule

Task: 5. Record attendance and take minutes at each meeting.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Minutes and attendance have been recorded at each meeting.

Task: 6. Maintain records of agenda, attendance, and minutes for each meeting

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: All available agendas, attendance rosters, and minutes have been maintained.

**Compliance with the Measurable Goal:**

Goal: Conduct SWMP Committee meetings in accordance with the identified schedule.

Year: 2

Compliance Activity: SWMP Committee meetings were held according to schedule..

**Accumulated data:**

The SWMP Committee has met 4 times during permitting year 2.

## **Minimum Measure: 3.0 Illicit Discharge Detection and Elimination**

### **BMP Report: Maintain the MS4 and Outfall Inventory**

**BMP:** Maintain the MS4 and Outfall Inventory

**BMP Description:** Develop a map of the MS4 system including the location of storm water discharge outfalls.

#### **Compliance with the implementation schedule:**

The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following tasks were implemented according to the implementation schedule.

Task: 1. Develop a map of the MS4 system including the location of the following:

- MS4 receiving streams
- Storm Water Outfalls
- Permit Coverage Area

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken: Maps of all MS4 systems have been created including the required attributes

Task: 2. Identify new outfalls and drainage structures during the review of development and construction plans.

Implementation Schedule: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken:

Task: 3. Update the MS4 map with the new drainage structures and outfalls.

Implementation Schedule: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Since maps were newly constructed, no updates were necessary.

Task: 4. Include new outfalls found in the field while conducting the MS4 outfall screening programs

Implementation Schedule: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: No new outfalls were found during this screening period.

### **Compliance with the Measurable Goal:**

Goal: Develop a map of the MS4 including MS4 receiving streams, storm water outfalls, permit coverage area, and any other information that may be required by the designated NPDES permitting authority.

Permit Year: 2

Activity Conducted: MS4 maps have been completed, including all necessary information.

### **BMP Report: MS4 Outfall Screening**

#### **BMP: MS4 Outfall Screening**

**BMP Description:** Develop standard investigation procedures to identify, report and follow-up on illicit discharges to the LaDOTD storm sewer system and conduct systematic visual inspection of outfalls within urbanized areas in the MS4 in order to identify the presence of illicit discharges.

### **Compliance with the implementation schedule:**

The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following tasks were implemented according to the implementation schedule.

Task: 1. Develop outfall screening procedures and forms for record keeping and data entry into MS4 outfall screening databases for areas located within the urbanized area and within the non-urbanized permit area.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken:

Task: 2. Develop procedures for classification of non-storm water discharges as allowable (e.g. permitted discharges) or illicit.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken:

Task: 3. Train LaDOTD personnel in field visual observation techniques necessary for the identification of illicit discharges.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken:

Task: 4. Develop a system to track illicit discharges upon identification.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken:

Task: 5. Develop a schedule that allows for the screening of the urban outfalls within the permit term.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken:

Task: 6. Train LaDOTD personnel in the reporting of illicit discharges to the municipality with adequate legal authority to trace and eliminate illicit discharges.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: LaDOTD Environmental Evaluation Unit personnel have been trained in the reporting of illicit discharges. District personnel will be trained during permit year 3.

Task: 7. Report all illicit discharges identified and reported under this program to the appropriate municipality.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Such discharges will be reported.

Task: 8. Conduct follow-up inspections of illicit discharges identified and reported.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Follow-up inspections will be conducted as illicit discharges are identified.

Task: 9. Maintain records of outfall screening and illicit discharges identification for each outfall.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Outfall records are currently being maintained.

### **Compliance with the Measurable Goal:**

Goal: 1 Develop a systematic outfall screening schedule to ensure the screening of the entire MS4 system within the 5 year permit term.

Permit Year: 2

Activity Conducted: Outfall screening schedule has been developed.

Goal: 2 Investigate outfall drainage systems that are identified as having illicit discharges from the MS4 and report illicit discharges to the appropriate municipality.

Permit Year: 2

Activity Conducted: Illicit discharges will be investigated.

Goal: 3 Complete screening of 25% of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule.

### **BMP Report: Illicit Discharge Employee Training**

#### **BMP: Illicit Discharge Employee Training**

**BMP Description:** Educate LaDOTD personnel on the identification of illicit discharges and procedures for reporting observations to outfall inspection personnel.

#### **Compliance with the implementation schedule:**

The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following tasks were implemented according to the implementation schedule.

Task: 1. Develop a list of personnel to be educated on the identification and reporting of illicit discharges.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Personnel requiring education have been identified.

Task: 2. Develop training materials, internal reporting forms, and reporting procedures including who will receive reports on illicit discharges.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: All training materials have been developed.

Task: 3. Develop a schedule for conducting training of identified personnel.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Training schedule has been developed. Schedules will vary according to district.

Task: 4. Conduct training of personnel according to the schedule.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Environmental Evaluation Unit personnel have been trained.

**Compliance with the Measurable Goal:**

Goal: 1. Develop a list of personnel to be educated on the identification and reporting of illicit discharges.

Permit Year: 2

Activity Conducted: List of personnel to be trained has been developed.

Goal: 2. Develop training materials, internal reporting forms, and reporting procedures including who will receive reports on illicit discharges.

Permit Year: 2

Activity Conducted: Training materials have been developed.

Goal: 3. Develop a schedule for conducting training of identified personnel.

Permit Year: 2

Activity Conducted: Training schedule has been developed.

Goal: 4. Conduct training for identified personnel in accordance with the identified schedule.

Permit Year: 2

Activity Conducted: Training of Environmental Evaluation Unit personnel has begun according to schedule.

Goal: 5. Conduct training for any new personnel that may be involved with the identification and reporting of illicit discharges.

Permit Year: 2

Activity Conducted: Training has begun and will continue during permit year 3.

## **Minimum Measure 4.0 Construction Site Runoff**

### **BMP Report: Construction Inspection Procedures**

#### **BMP: Construction Inspection Procedures**

**BMP Description:** Develop Inspection procedures and educate the LaDOTD construction community on LaDOTD storm water guidelines related to construction activities.

#### **Compliance with the implementation schedule:**

The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following tasks were implemented according to the implementation schedule.

Task: 2. Develop a list of items to incorporate in the inspection of construction sites based on the final construction storm water guidelines, including the following categories:

- Use of temporary erosion controls
- Control of other construction related wastes
- Operational and general prohibitions
- Site closure and stabilization requirements
- On-site documentation and records
- Corrective actions and on-site communication issues

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: LaDOTD has developed a list of items to be included in the inspection of construction sites.

Task: 3. Develop draft construction inspection forms and procedures necessary to inspect LaDOTD construction sites in order to ensure compliance with the LaDOTD construction storm water guidelines.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: A Storm Water Pollution Prevention Plan Inspection and Maintenance Report Form has been created and is currently in use.

Task: 4. Develop procedures to enforce LaDOTD guidelines utilizing construction contract language.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Standard procedures are in place to ensure compliance. Contractor will not be compensated if non-compliance exists.

Task: 6. Develop the final version of the construction inspection forms and procedures.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Final versions of construction inspection forms and procedures have been developed

### **Compliance with the Measurable Goal:**

Goal: Develop a list of items to incorporate in the inspection of LaDOTD construction sites based on the final LaDOTD construction storm water guidelines.

Permit Year: 2

Activity Conducted: A list of items was developed

Goal: Develop draft inspection forms and procedures necessary to inspect LaDOTD construction sites in order to ensure compliance with LaDOTD construction storm water guidelines.

Permit Year: 2

Activity Conducted: Inspection forms were developed and are currently in place

### **BMP Report: Construction Plans Review**

#### **BMP: Construction Plans Review**

**BMP Description:** Implement a construction plans review process that focuses on compliance with LaDOTD construction storm water guidelines.

### **Municipal Construction Site Summary Data:**

Total number of approved construction plans:

**Compliance with the implementation schedule:** The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following task was implemented according to the implementation schedule.

Task: 3. Provide plans review procedures to the SWMP Committee for review.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/31/2005

Description of Action Taken: The SWMP Committee is in the process of reviewing plans review procedures that were submitted.

Description of Action Taken: The LaDOTD is currently developing a system to track construction site plan review and construction site inspections.

### **Compliance with the Measurable Goal:**

Goal: Provide the SWMP Committee with an opportunity to review and comment on plans review procedures.

Permit Year: 2

Activity Conducted: Plan review procedures have been submitted to the SWMP Committee for review and comment

### **BMP Report: Construction Site Inspection**

#### **BMP:** Construction Site Inspection

**BMP Description:** Conduct inspections of LaDOTD construction sites that discharge storm water to the MS4 to determine compliance with LaDOTD construction storm water guidelines.

**BMP Reporting Requirement:** Annually report on the number of construction site storm water permit inspections under this program.

The LaDOTD currently conducts inspections at all active constructions sites covered by the LaDEQ construction general permit. The LaDOTD has incorporated Phase II construction storm water guidelines into existing Phase I construction specifications for construction general permit compliance.

**Compliance with the implementation schedule:** The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following tasks were implemented according to the implementation schedule.

Task: 1. Develop internal procedures for tracking new and on-going construction activities.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken:

Task: 2. Train LaDOTD inspection personnel on LaDOTD construction storm water guidelines and inspection procedures.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken:

### **Compliance with the Measurable Goal:**

Goal: 1. Develop internal procedures for tracking new and on-going construction activities.

Permit Year: 2

Goal: 2. Train LaDOTD inspection personnel on the LaDOTD construction storm water guidelines and inspection procedures.

Permit Year: 2

Activity Conducted:

### **BMP Report: Construction Community Education**

**BMP:** Construction Community Education

**BMP Description:** Development and distribution of educational materials that focus on LaDOTD construction storm water guidelines, and plan review and site inspection procedures that affect the LaDOTD construction community.

**BMP Reporting Requirement:** Annually report on educational materials distributed, attendance at presentations, and identity of any changes made to local construction storm water regulations.

The LaDOTD is currently planning construction community educational efforts for the third year of the permitting program. The LaDOTD has begun the budgeting process for this BMP.

**Compliance with the implementation schedule:** The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following task was implemented according to the implementation schedule.

Task: 1. Develop or acquire educational materials (LaDOTD construction and erosion control guidelines) for informing the LaDOTD construction community (contractors, developers, engineers, architects) about LaDOTD construction policies

Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken:

**Compliance with the Measurable Goal:**

All measurable goals under this BMP will be evaluated in the third and fourth years of the permit term.

Goal: Develop educational materials designed to inform the LaDOTD construction community on applicable LaDOTD construction storm water guidelines.

Permit Year: 3

Goal: Distribute educational materials to contractors that require LaDOTD approved construction erosion control plans as determined in the plans review process.

Permit Year: 3

Goal: Distribute or redistribute educational materials on the LaDOTD construction storm water guidelines as the LaDOTD program changes.

Permit Year: 4

### **BMP Report: Construction Related Public Reporting**

**BMP:** Construction Related Public Reporting

**BMP Description:** Provide the public with a mechanism to report and receive feedback on construction related storm water problems.

**BMP Reporting Requirement:** Annually report on the quantity of public reports received under this program.

**Compliance with the implementation schedule:** The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following task was implemented according to the implementation schedule.

Task: 3 Develop an internal tracking system to accept and issue acknowledgments of receipt of information reported by the public and forward to appropriate contact person.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken: An illicit discharge reporting feature has been included in the storm water website.

### **Compliance with the Measurable Goal:**

Goal: Implement the public reporting mechanism at LaDOTD construction sites.

Permit Year: 2

Activity Conducted: The LaDOTD plans to post signs at construction site entrances with the website address, so that concerns may be reported.

## **Minimum Measure 5.0 Post-Construction Runoff**

### **BMP Report: Development of Project Inspection Procedures**

#### **BMP: Development of Project Inspection Procedures**

**BMP Description:** Develop inspection forms and procedures for new highway development and re-development project inspections based on the LaDOTD post-construction runoff guidelines.

The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following tasks were implemented according to the implementation schedule.

Task: 1. Develop a list of items to incorporate in the inspection of development and re-development project sites based on the final post-construction runoff control guidelines including consideration of the following:

- Construction of controls according to approved development plans and specifications
- Adherence to any legal commitment to operate or maintain permanent storm water quality structures
- Conformance to open space and landscaping requirements
- Conformance to any low impact development standards

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken:

Task: 2. Develop inspection forms and procedures necessary to inspect LaDOTD new and redevelopment projects in order to ensure compliance with LaDOTD post-construction runoff guidelines.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken:

### **Compliance with the Measurable Goal:**

Goal: Develop inspection forms and procedures necessary to inspect LaDOTD development projects in order to ensure compliance with LaDOTD post-construction guidelines

Permit Year: 2

Activity Conducted:

## **BMP Report: New Development and Re-development Project Inspection**

**BMP:** New Development and Re-development Project Inspection

**BMP Description:** Inspect LaDOTD development and re-development projects to ensure conformance to maintenance schedules and LaDOTD post-construction guidelines.

### **Compliance with the implementation schedule:**

The permittee is currently in compliance with the implementation schedule as established in the SWMP implementation schedule. The following tasks were implemented according to the implementation schedule.

Task: 1. Develop guidelines for the inclusion of post-construction control measures to be incorporated into the design process for highway development projects within the urbanized areas of the permit coverage area.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Engineering Directives and Standards (EDMS) including guidelines for the inclusion of post-construction control measures have been drafted to address this task. Section 204 of *Standard Specifications for Roads and Bridges* has been revised to address erosion control.

Task: 2. Develop a process for the review of highway development plans to determine the need for post-construction control measures.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Engineering Directives and Standards (EDMS) including guidelines for the inclusion of post-construction control measures have been drafted to address this task.

Task: 3. Develop internal tracking and plan review procedures in order to assess conformance to LaDOTD post-construction runoff guidelines.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: A draft set of plan checking and design guidelines have been developed with the intention of being included in an addendum to the LaDOTD Hydraulics Manual.

### **Compliance with the Measurable Goal:**

Goal: Develop guidelines for the inclusion of post-construction control measures to be incorporated into the design process for highway development projects within the urbanized areas of the permit coverage area.

Permit Year: 2

Activity Conducted: EDSM has been drafted to address goal. Section 204 of *Standard Specifications for Roads and Bridges* has been revised to address erosion control.

Goal: Develop a process to review highway development plans in order to determine compliance with LaDOTD post-construction guidelines.

Permit Year: 2

Activity Conducted: EDSM has been drafted to address goal.

Goal: Develop internal tracking and plan review procedures to ensure compliance with LaDOTD post-construction guidelines.

Permit Year: 2

Activity Conducted: Guidelines have been drafted to be included as an addendum to LaDOTD Hydraulics Manual.

### **BMP Report: Protection of Sensitive and/or Impaired Water Bodies**

#### **BMP:** Protection of Sensitive and/or Impaired Water Bodies

**BMP Description:** Identify sensitive water bodies and stream segments with approved TMDL allocations and implement appropriate pollution control strategies.

**Compliance with the implementation schedule:** The permittee is currently in compliance with the implementation schedule as established in the SWMP Implementation Schedule. The following task was implemented according to the implementation schedule.

Task: 2. Research opportunities for control measures designed to reduce the discharge of target pollutants to sensitive or impaired water bodies.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken: The LaDOTD has researched control measures in order to reduce the discharge of target pollutants to sensitive or impaired water bodies.

#### **Compliance with the Measurable Goal:**

Goal: Research opportunities to incorporate BMPs to reduce impacts to sensitive or impaired water bodies

Permit Year: 2

Activity Conducted: The LaDOTD has researched opportunities to incorporate BMPs to reduce impacts to sensitive or impaired water bodies

### **BMP Report: Participation in Local Watershed Planning and Modeling**

**BMP:** Participation in Local Watershed Planning and Modeling

**BMP Description:** Participate in local watershed planning meetings in order to stay informed of local surface water quality issues, Total Maximum Daily Loads (TMDL) initiatives, and pollutants of concern for impaired or sensitive water bodies.

**BMP Reporting Requirement:** Annually report on the number of watershed planning meetings attended and any associated changes in the MS4's BMP's.

**Compliance with the implementation schedule:** The permittee is in compliance with the implementation schedule as established in the SWMP Implementation Schedule for most of the tasks. The following tasks either have been implemented or are in the process of being implemented according to the implementation schedule.

Task: 2. Participate in watershed planning and surface water monitoring data presentation meetings.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken: Not Yet Implemented due to availability of such presentations.

Task: 3. Develop a list of sensitive and impaired water bodies as identified by the local watershed planning and monitoring agencies or state and federal monitoring agencies.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD has developed a list of 303d listed water bodies within the permit coverage areas. The DOTD is currently working with the list to identify impaired water bodies within the coverage area.

Task: 4. Maintain records of any TMDL requirements and pollutants of concern for any LaDOTD MS4 receiving streams that are considered sensitive or impaired.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD has obtained a list of TMDL requirements for all MS4 receiving streams that are considered sensitive or impaired as provided by the Louisiana Department of Environmental Quality.

Task: 5. Review TMDL requirements or load allocations to determine if additional Best Management Practices (BMPs) or changes in existing practices are required to meet TMDL load allocations or to protect sensitive or impaired water bodies located within the MS4 jurisdiction.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date:

Description of Action Taken: Task Not Yet Implemented

### **Compliance with the Measurable Goal:**

Goal: Participate in watershed planning and surface water monitoring data presentation meetings.

Permit Year: 2

Activity Conducted: No Activity Conducted

Goal: Develop a list of sensitive and impaired water bodies as identified by the local watershed planning and monitoring agencies or state and federal monitoring agencies.

Permit Year: 2

Activity Conducted: LaDOTD has obtained 303(d) list as provided by the Louisiana Department of Environmental Quality

Goal: Maintain records of any TMDL requirements and pollutants of concern for any LaDOTD MS4 receiving streams that are considered sensitive or impaired.

Permit Year: 2

Activity Conducted: LaDOTD has obtained the TMDL requirements as provided by the Louisiana Department of Environmental Quality

## **Minimum Measure: 6.0 Good Housekeeping**

### **Best Management Practice Report**

#### **BMP Report: Herbicide Application**

**BMP:** Herbicide Application

**BMP Description:** Train herbicide application employees on the proper use of herbicide products.

**BMP Reporting Requirement:** Annually report on the total volume of herbicide applied.

#### **Compliance with the implementation schedule:**

The permittee is currently in compliance with the implementation schedule as established in the SWMP implementation schedule. The following tasks were implemented according to the implementation schedule.

Task: 5. Assess opportunities to implement alternative practices for non-herbicide methods of maintenance.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: LaDOTD has researched opportunities to implement alternative practices for non-herbicide methods of maintenance.

#### **Compliance with the Measurable Goal:**

Goal: Assess each location for opportunities to implement alternative practices for non-herbicide methods of maintenance.

Permit Year: 2

Compliance Activity: Alternative methods are continuously being researched

#### **BMP Report: Employee Training**

**BMP:** Employee Training

**BMP Description:** Develop and conduct employee training programs that focus on right-of-way maintenance, fleet and building maintenance, construction activities, illicit discharge detection and reporting and MS4 maintenance.

**Compliance with the implementation schedule:**

The permittee is currently in compliance with the implementation schedule as established in the SWMP implementation schedule. The following tasks were implemented according to the implementation schedule.

Task: 1. Develop or acquire employee training materials on the following subjects:

- Right-of-way maintenance
- Fleet and building maintenance
- Construction activities
- Illicit discharge detection and reporting
- MS4 maintenance

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 5/10/2005

Description of Action Taken: Training materials have been developed or acquired for the above referenced subjects.

Task: 2. Identify personnel required to attend training programs.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Persons required to attend training programs have been identified.

Task: 3. Develop a schedule for conducting employee training programs.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: Trainings will be given on annual basis or as new employees are brought into the system. Schedules will vary according to districts.

**Compliance with the Measurable Goal:**

Goal: Develop or acquire employee training materials on the selected subjects.

Permit Year: 2

Activity Conducted: Training materials for the selected subjects have been developed or acquired.

**BMP Report: Assess Pavement Preservation Activities**

**BMP:** Assess Pavement Preservation Activities

**BMP Description:** Assess pavement preservation activities and modify procedures to reduce storm water quality impacts.

**BMP Reporting Requirement:** Annually report on the use of alternative practices.

**Compliance with the implementation schedule:**

The permittee is currently in compliance with the implementation schedule as established in the SWMP implementation schedule. The following tasks were implemented according to the implementation schedule.

Task: 1. Assess current pavement preservation activities to determine if modification of current practices would benefit storm water quality.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD is currently evaluating current pavement preservation activities for water quality impacts. The LaDOTD is currently developing additional guidance materials to address impacts related to storm water runoff from overlay projects.

**Compliance with the Measurable Goal:**

Goal: *Assess current roadway maintenance activities to determine if modification to current practices would benefit storm water quality.*

Permit Year: 1

Compliance Activity: The LaDOTD is currently evaluating current pavement preservation activities for water quality impacts. The LaDOTD is currently developing additional guidance materials to address impacts related to storm water runoff from overlay projects.

**BMP Report: Catch Basin Cleaning**

**BMP:** Catch Basin Cleaning

**BMP Description:** Reduce sediment and floatable materials discharges by routinely cleaning MS4 catch basin and storm water inlet structures.

**Compliance with the implementation schedule:**

Task: 1. Continued implementation of the catch basin cleaning program on an as-needed schedule.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD has continued implementation of the existing catch basin cleaning program.

Task: 2. Maintain records of the estimated quantity of materials removed from catch basins and surface inlet structures.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD is currently developing methods for estimating catch basin cleaning efforts.

Task: 3. Evaluate the catch basin cleaning schedule on an annual basis.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The catch basin cleaning program will be continued on an as needed basis.

#### **Accumulated data:**

### **BMP Report: Vehicle Maintenance**

#### **BMP: Vehicle Maintenance**

**BMP Description:** Maintain LaDOTD owned vehicles according to manufacturer's specifications and identify and eliminate vehicle fluid leaks.

#### **Compliance with the implementation schedule:**

Task: 1. Develop and maintain an inventory of LaDOTD owned vehicles.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD currently maintains a database of vehicles and tracks maintenance of vehicles according to manufacturer's specifications at each District.

#### **Compliance with the Measurable Goal:**

Goal: *Develop and maintain an inventory of permittee owned vehicles.*

Permit Year: 1

Compliance Activity: The LaDOTD currently maintains a database of vehicles and tracks maintenance of vehicles according to manufacturer's specifications at each District.

### **BMP Report: Spill Prevention Plans**

#### **BMP: Spill Prevention Plans**

**BMP Description:** Comply with federal Spill Prevention Control and Counter measures (SPCC) plan regulations, and review spill response procedures to ensure storm water quality protection measures are considered during spill response.

**Compliance with the implementation schedule:**

Task: 1. Evaluate each LaDOTD owned facility and determine if Spill Prevention Control and Countermeasures plans (SPCC) are required.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD is currently evaluating district facilities to determine if SPCC plans are required or would need update due to the new EPA rules.

Task: 2. Develop and/or maintain SPCC plans for LaDOTD owned facilities that require plans.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD is currently evaluating district facilities to determine if SPCC plans are required or would need update due to the new EPA rules.

Task: 3. Comply with SPCC plan requirements at qualifying LaDOTD owned facilities, including consideration of the following:- Conduct employee training- Maintain spill prevention equipment- Maintain SPCC records- Update and re-certify the SPCC plan according to SPCC regulations

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD is currently evaluating district facilities to determine if SPCC plans are required or would need update due to the new EPA rules.

**Compliance with the Measurable Goal:**

Goal: *Develop an inventory of permittee owned facilities that may be required to have Spill Prevention Control and Countermeasures Plans (SPCC Plans).*

Permit Year: 1

Compliance Activity: The LaDOTD is currently evaluating district facilities to determine if SPCC plans are required or would need update due to the new EPA rules.

Goal: *Evaluate identified facilities and determine if SPCC Plans are required.*

Permit Year: 1

Compliance Activity: The LaDOTD is currently evaluating district facilities to determine if SPCC plans are required or would need update due to the new EPA rules.

Goal: *Develop and/or maintain SPCC Plans for permittee owned facilities that require plans.*

Permit Year: 1

Compliance Activity: The LaDOTD is currently evaluating district facilities to determine if SPCC plans are required or would need update due to the new EPA rules.

Goal: *Comply with SPCC plan requirements at qualifying permittee owned facilities.*

Permit Year: 1

Compliance Activity: The LaDOTD is currently evaluating district facilities to determine if SPCC plans are required or would need update due to the new EPA rules.

### **BMP Report: Illegal Dumping**

#### **BMP: Illegal Dumping**

**BMP Description:** Identify and investigate illegal dumping locations owned by the LaDOTD in order to determine the source of materials and report identified illegal dumpers to the appropriate local agency with legal authority.

#### **Compliance with the implementation schedule:**

Task: 1. Conduct an initial inspection of the MS4 jurisdiction in order to identify existing illegal dumping locations.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD has conducted initial inspections of known dumping locations. The locations were identified by maintenance supervisors and litter collection staff.

#### **Compliance with the Measurable Goal:**

Goal: *Develop a list of illegal dumping locations identified.*

Permit Year:

Compliance Activity:

Goal: *Conduct investigations of illegally in order to attempt to identify the sources of the materials.*

Permit Year: 1

Compliance Activity: The LaDOTD has conducted initial inspections of known dumping locations. The locations were identified by maintenance supervisors and litter collection staff.

### **BMP Report: Street Sweeping**

#### **BMP: Street Sweeping**

**BMP Description:** Sweeping of streets and roadways in order to reduce the amount of sediment and associated pollutants discharged to the MS4 from roadways.

**Compliance with the implementation schedule:**

Task: 1. Identify the type of roadways that can be swept to remove sediment and other pollutants from the gutters, i.e. roadways with curb and gutter design.

Implementation Schedule Date: 3/10/2005

Actual Implementation Date: 3/10/2005

Description of Action Taken: The LaDOTD has continued implementation of street sweeping. The LaDOTD plans to sweep all highways with curb and gutter design and elevated interstate sections located within urbanized areas. A final inventory of these sections and frequencies will be developed in the next reporting period.

**Compliance with the Measurable Goal:**

Goal: *Identify the type of roadways that can be swept to remove sediment and other pollutants from the gutters.*

Permit Year: 1

Compliance Activity: The LaDOTD has continued implementation of street sweeping. The LaDOTD plans to sweep all highways with curb and gutter design and elevated interstate sections located within urbanized areas. A final inventory of these sections and frequencies will be developed in the next reporting period.

**SECTION 3 Summary of Activities - Next Reporting Cycle**

The LaDOTD plans to continue implementation during the next reporting cycle according to the implementation schedule attached as Appendix A. The implementation schedule indicates status and the expected completion date for each BMP.

**SECTION 4 Proposed Changes to the SWMP**

No changes to the SWMP have been made within the current reporting period.